REMARKS

In the Office Action dated August 10, 2004, claims 1, 2, 11, 12, and 21-24 were rejected under 35 U.S.C. § 102 over U.S. Patent No. 6,064,656 (Angal); claims 3, 4, 13, and 14 were rejected under § 103 over Angal in view of U.S. Patent No. 6,427,168 (McCollum); and claims 5-10 and 15-20 were rejected under § 103 over Angal in view of U.S. Patent No. 6,459,700 (Hoang).

As explained in the Preliminary Amendment filed by Applicant on June 8, 2004, Angal does not disclose the following feature of claim 1: a first e-service (that provides a portal to the composite e-service) sending a first request to a second e-service at a first lower level of the tree structure, and a second e-service sending a second request to a third e-service at a level of the tree structure lower than the first lower level.

The present Office Action identifies the MIS (management information server) 150 as being the first e-service, and the auxiliary server 152 as being the second e-service. 8/10/2004 Office Action at 3. However, the Office Action did not specifically identify which component of the system described in Angal constitutes the third e-service recited in the claim. Instead, the Office Action pointed to "objects in respective designated subtree managed by the auxiliary server 152 of the management objects tree." *Id.* The Office Action further stated that "each of the auxiliary servers 152 performs access control for objects in its own respective designated subtrees of the management objects tree." *Id.* The fact that each auxiliary server 152 is able to process a portion of the management object tree 170, as taught by Angal, is not the same as a second e-service at a first lower level of a tree structure sending a second request to a third e-service at a level of the tree structure lower than the first lower level.

Angal describes a distributed access control system to efficiently handle large numbers of access requests to a network having large numbers of management objects. Angal, 2:27-32. An access control engine is distributed across a plurality of servers, including a primary management information server 150 (MIS) and auxiliary servers 152. Angal, 6:21-24, 45-48. The MIS 150 of Angal only performs access control for objects at the top of a management objects tree, while each of the auxiliary servers 152 perform access control for objects in respective designated subtrees of the management objects tree. Angal, 6:55-59. If an access request targets portions of the management object tree that are serviced by more than one server, the access request is split into

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access sub-requests by the MIS 150 and sent to the appropriate auxiliary servers 152. Angal, 7:16-20. Note, however, that Angal teaches that only the MIS 150 sends sub-requests to auxiliary servers 152--the auxiliary servers 152 do *not* in turn send further sub-requests to lower level auxiliary servers.

As explicitly taught by Angal, each auxiliary server 152, 154 includes the same hardware and software elements found in the MIS 150, except for "the special procedures (172, 178) in the MIS used for handling the receipt and partitioning of access requests, and the combining of responses ...." Angal, 8:13-17. Angal thus expressly teaches that the auxiliary server 152 is specifically designed *not* to be able to partition requests. Therefore, the auxiliary server 152 would clearly not be able to send requests to other auxiliary servers to process objects of a tree structure further down in hierarchy. In view of the explicit teaching in Angal that the MIS 150 is the only server that is able to partition requests for forwarding to auxiliary servers, and that each auxiliary server does not have the logic to perform the partitioning of requests for enabling processing of partitioning requests by further auxiliary servers, it is respectfully submitted that Angal clearly does not teach a second e-service at a first lower level of the tree structure that sends a second request to a third e-service at a level of the tree structure lower than the first lower level.

Claim 1 is therefore not anticipated by Angal.

Angal similarly does not disclose the subject matter of claim 11, which recites that to perform the service interactions, the first e-service sends one or more requests to one or more services at a lower level of the tree structure, and the *one or more e-services at the first lower level sends one or more requests to one or more e-services at a level in the tree structure lower than the first lower level.* As noted, the auxiliary servers 152 cannot be the one or more e-services at the first lower level of the tree structure that are able to send one or more requests to one or more e-services at a level in the tree structure lower than the first lower level.

Independent claim 21 is also not anticipated by Angal. Claim 21 recites a plurality of modules to provide a set of digital services arranged in a tree structure, where the digital services comprise at least one of on-line electronic commerce services, on-line news services, on-line sports services, on-line entertainment services, and on-line educational services. In the rejection, the Office Action stated that "Angal teaches a network management system 100 for controlling

access to management objects in a computer network 106, where the computer network 106 can be virtually any type of computer implemented network that uses a management protocol for performing management functions (Angal, C4: L43-50)." 8/10/2004 Office Action at 4. This cited passage of Angal does *not* expressly teach that digital services is at least one of the services listed in claim 21. If the rejection is based on inherency, "that any type of computer implemented network" must necessarily include one of the services listed in claim 21, the Office Action has clearly failed to provide any support or explanation for this inherency argument. Therefore, the anticipation rejection of claim 21 is clearly defective, as the Office Action has provided no rationale whatsoever regarding how Angal teaches specifically a plurality of modules to provide the set of digital services as recited in claim 21.

Angal describes a distributed access control system that handles access requests to management objects that represent different aspects of devices, such as configuration, statistics, status, and control. Angal, 1:42-46; 2:27-32. Such different aspects of devices do not constitute on-line electronic commerce services, on-line news services, on-line sports services, on-line entertainment services, or on-line educational services.

Claim 21 is therefore not anticipated by Angal.

Dependent claims are allowable for at least the same reasons as corresponding independent claims. Moreover, with respect to dependent claim 23 (which depends indirectly from claim 21), Angal does not teach that a first one of the modules associated with a first digital service is adapted to send one or more requests to one or more modules associated with digital services at first lower level of the tree structure, and the one or more modules associated with digital services at the first lower level to send one or more requests to one or more modules associated with digital services at a level in the tree structure lower than the first lower level. A discussion of why Angal does not disclose such a feature is provided above with respect to claim 1.

Claims 3-10 and 13-20 were rejected under § 103 over Angal in view of another reference. Because the rejection of each of base claims 1, 11, and 21 has been overcome, it is respectfully submitted that the obviousness rejections have also been overcome.

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In view of the foregoing, all claims are in condition for allowance, which action is respectfully requested. The Commissioner is authorized to charge any additional fees and/or credit any overpayment to Deposit Account No. 08-2025 (10991884-1).

Respectfully submitted,

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